

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

FILED
CHARLOTTE, NC

DEC 27 2011

U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

Gretchen Loflin
PLAINTIFF,

vs.

COMPLAINT

McAngus, Goudelock +

CASE NO. 3:11-cv-656-MOC

DEFENDANT(S).

A. JURISDICTION

This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended, for employment discrimination. Jurisdiction is specifically conferred on this Court by 42 U.S.C. Section 2000e(5). Equitable and other relief are also sought under 42 U.S.C. 2000e(5)(g). Jurisdiction is also based on 28 U.S.C. Sections 1331, 1343 and 42 U.S.C. Sections 1981 et seq. Where employment discrimination is based upon age is alleged, jurisdiction is conferred by 29 U.S.C. Sections 626(c)(1) and 626(e) and appropriate relief is also sought.

B. PARTIES

1. Name of Plaintiff:
Address:

Gretchen Loflin
5420 Bannock Glen Dr.
Charlotte, NC 28212

2. Name of first Defendant:

Address:

McAngus, Gaudelock & Courie
6302 Fairview Rd.
Suite 700
Charlotte, NC 28210

3. Name of second Defendant:

Address:

4. Name of fourth Defendant:

Address:

(Use additional sheets if necessary.)

C. NATURE OF CASE

1. The address at which I sought employment or was employed by the defendant(s) is:

McAngus, Gaudelock & Courie
6302 Fairview Rd.
Suite 700
Charlotte, North Carolina 28210

2. The discriminatory acts occurred on or about:

September 3rd, 2009 (Month, Day, Year)

3. I filed charges with the Equal Employment Opportunity Commission regarding the defendant's discriminatory conduct on or about:

March 30th, 2010 (Month, Day, Year)

4. The Equal Employment Opportunity commission sent the attached "Notice of Right to Sue" which I received on:

October 1st, 2011 (Month,Day,Year)
(Please attach the "Notice of Right to Sue" to this complaint.)

5. The discriminatory acts that are the basis of this suit are:

- a. _____ Failure to employ me.
- b. _____ Failure to promote me.
- c. ☒ Termination of my employment.
- d. _____ Demotion.
- e. _____ Denied equal pay/work.
- f. _____ Sexual harassment.
- g. _____ General harassment.
- h. _____ Other acts (Be specific: Attach an additional sheet if necessary)

* No regard to current medical condition which caused extreme results.
* Retaliation due to future employment reference.

6. Defendant's conduct is discriminatory with respect to:

- | | | | |
|----------|----------|----------|--------------------|
| a. _____ | my race | d. _____ | my religion |
| b. _____ | my color | e. _____ | my national origin |
| c. _____ | my sex | f. _____ | my age |

* wrongful termination and retaliation.

7. I believe that the defendant is still committing these acts against me.

YES ☒ NO _____

D. CAUSE OF ACTION

1. I allege that the defendant has discriminated against me and that the following facts form the basis for my allegations:

- a. (1) Count I: Wrongful Termination
- (2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing any legal authority. Use additional sheets if necessary.)
Please see attached document 1
- b. (1) Count II: Retaliation
- (2) Supporting Facts:
Please see attached document 2

E. INJURY

How have you been injured by the actions of the defendant(s)?

Severe mental anguish and distress

Major depressive disorder from not being able to obtain employment in the field I have worked hard to achieve.

F. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action? YES___ NO___

If your answer is "YES", describe each lawsuit. (If there are more than one lawsuits, describe additional lawsuits on additional separate pages, using the same outline.)

1. Parties to previous lawsuits:

Plaintiff(s):_____

Defendant(s):_____

2. Name of court and case or docket number:

3. Disposition (for example, was the case dismissed? Was it appealed? Is it still pending?)

4. Issues raised:

5. When did you file the lawsuit? _____

Date: Month/Year

6. When was it (will it be) decided? _____

Have you previously sought informal or form relief from the appropriate administrative officials regarding the acts complained of in Part D?

YES ____ NO ____

If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.

G. REQUEST FOR RELIEF

I believe I am entitled to the following relief:

The paralegal salary I have missed for the past 2+ years and the relief for the continual mental distress and continued anxiety issues I will have possibly forever.

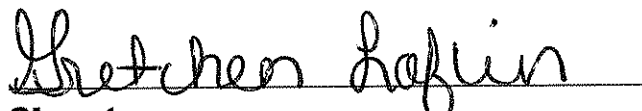
JURY TRIAL REQUESTED

YES ____ NO ____

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at _____ on _____.
(Location) (Date)


Signature